UNITED STATES BANKRUPTCY COURT DISTRICT OF NEW JERSEY

Timothy P. Neumann, Esq. [TN6429] BROEGE, NEUMANN, FISCHER & SHAVER, LLC

25 Abe Voorhees Drive

Manasquan, New Jersey 08736

Tel: (732) 223-8484

Email: tneumann@bnfsbankruptcy.com

Attorneys for Creditor and Party-in-Interest

Wrazen Homes, LLC

In Re:

CASE NO.: 23-13873/MBK

Louis A. Koehler, IV,

CHAPTER 13

Debtor.

JOINDER IN OBJECTION TO CONFIRMATION AND OBJECTION TO CONFIRMATION

Wrazen Homes, LLC, joins in and adopts the Objection to Confirmation filed on behalf of secured creditor Rocket Mortgage, LLC f/k/a Quicken Loans, LLC f/k/a Quicken Loans Inc. It further objects based upon the fact that it was the successful bidder at a sheriff sale which occurred prior to the Petition Date, more than 60 days has elapsed since the Petition Date, the Debtor has not redeemed, and the Debtor has lost the right to cure the mortgage default. See, 11 U.S.C. 108 and *In re Connors*, 497 F.3d 314 (3rd Cir. 2007).

BROEGE, NEUMANN, FISCHED & SHAVER, LLC Attorneys for Wrazen Homes, LLC

/s/ Timothy P. Neumann
Timothy P. Neumann, Esq.

Date: July 7, 2023